

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

Vs.

No. 2:13-cv-02289-JPM-dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants,

and

STATE OF TENNESSEE,

Defendant-Intervenor.

**DEFENDANTS' MOTION FOR LEAVE TO
EXCEED PAGE LIMITATION IN REPLY BRIEF**

COME NOW the defendants, Pediatric Anesthesiologists, P.A., and Babu Rao Paidipalli, by and through their undersigned counsel, pursuant to Local Rule 7.2(e), and respectfully request that this Court grant them leave to exceed the five (5) page limitation set forth in the Local Rules for their Reply Brief to address new issues raised in Plaintiff's Response and Memorandum of Law In Opposition To Defendant's Motion For Qualified Protective Order. This Court has previously granted Defendants' Motion For Leave To File Reply Brief. (ECF 87). Defendants now request leave of Court to exceed the five (5) page limit on Reply Briefs and to file a Reply Brief, which is seventeen (17)

pages in length, excluding exhibits. Defendants rely on their Memorandum in support of this Motion.

WHEREFORE, Defendants respectfully request that the Court grant Defendants leave to exceed the page limitation set forth in the Local Rules with regard to Defendants' Reply brief.

Respectfully submitted,

THE HARDISON LAW FIRM, P.C.

By: s/Albert G. McLean
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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), I hereby certify that on January 29, 2014, I consulted with Mark Ledbetter, counsel for plaintiffs, and J. Kimbrough Johnson and Marcy Dodds Magee, counsel for defendant, Mark P. Clemons, and with Stephanie Bergmeyer, counsel for the State of Tennessee, via e-mail concerning the contents of this motion, and that all counsel are not able to reach an accord as to all issues pertaining to this motion.

s/Albert G. McLean
ALBERT G. MCLEAN

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via the Court's electronic filing system upon:

Mark Ledbetter, Esq.
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this 29th day of January 2014.

s/Albert G. McLean

ALBERT G. MCLEAN